

GS.I The general supervision instruments and procedures (including monitoring, complaint and hearing resolution, etc.), used by the lead agency, identify and correct IDEA noncompliance in a timely manner.

1. Baseline/Trend Data and Analysis (for reporting period July 1, 2003 through June 30, 2004):

GENERAL SUPERVISION COMPONENTS

General Supervision Components in place during 2003-04

- SPOE and intake coordinator monitoring for referral process, intake, evaluation, eligibility determination and initial IFSP development
- Contracts and provider agreements for SPOEs and providers
- Interagency agreements for service provision and child find
- Central Finance Office (CFO), claims and billing system, Explanation of Benefits (EOB) to families
- Family survey
- Complaint system for child complaints, provider complaints and service complaints arising from EOB statements
- Investigation of questionable billing/authorizations for services including potential fraudulent billing
- Enrollment, training and credentialing requirements for providers
- SPOE child data system
- State Interagency Coordinating Council (SICC) is a venue for gathering information from stakeholders on a regular basis

Additional General Supervision Components put in place during 2004-05

- Informal provider issues database
- Additional provider and ongoing service coordinator monitoring activities
- Family exit survey
- Provider survey
- Regular general supervision data reviews
- IFSP Quality Indicators Rating Scale
- New SPOE contract for Phase 1 SPOEs
- First Steps regional consultant contracts filled

Additional Components to be put in place during Spring/Summer 2005

- New webSPOE software
- LEA surveys

Additional Components Pending Legislative Action

- New SPOE contract statewide
- Possible changes in provider structure within the system to improve provider oversight

These components are the building blocks of Missouri's system of general supervision. The table below shows how the components work together to address each of the Clusters and Probes of this Annual Performance Report. Additional information and/or data are located under each applicable cluster/probe. Each of the headings in the following table represent sources of data within the system of general supervision:

- Complaint System – Includes the existing formal Child Complaint and Due Process systems
- Informal Issue System – Will be comprised of a database for gathering provider or system issues brought to DESE's attention outside of the formal complaint system
- Data Systems – Includes data and reports available through the current SPOE software and the future web-based system
- Surveys – Includes existing parent surveys as well as future surveys for Providers and Local Education Agencies (LEA)
- Quality Indicators – Refers to the Quality Indicators Rating Scale and the data to be gathered from the future application of the rating scale
- SPOE/Service Coordinator Monitoring – Includes current and future data on SPOEs and service coordinators gathered through various sources of the general supervision system, including contracts, monitoring reviews, data reviews, consultants, etc.
- Provider Monitoring/Oversight – Includes current and future data on service providers gathered through various sources of the general supervision system, including contracts, enrollment requirements, data reviews, monitoring reviews, surveys, interviews, etc.
- Interagency Work – Includes interagency agreements and memoranda of understanding, primarily in regards to child find and service coordination
- Other – Includes current and future sources of information utilized in the system of general supervision

Current and Proposed Components of Missouri's System of General Supervision

Indicator/Probe	Complaint System	Informal Issues System	Data Systems	Surveys	Quality Indicators	SPOE/SC Monitoring	Provider Monitoring/Oversight	Interagency Work	Other
GS.I Identification and correction of noncompliance	Yes	Yes	SPOE webSPOE Various reports	Parent Provider LEA		Yes	Yes	Correction of any identified noncompliance	
GS.II Systemic issues identified and remediated	Yes	Yes	SPOE webSPOE Various reports	Parent Provider LEA		Yes	Yes	Correction of any identified noncompliance	
GS.III Timely completion of complaints, due process	Yes								
GS.IV Sufficient number of trained providers	Yes	Yes	SPOE webSPOE	Parent Provider		Yes	Yes	DMH Service Coordinators	Provider database – enrollment and training
GS.V Collection and reporting of accurate and timely data			SPOE webSPOE Various reports			Yes	Yes		
CC.I, CC.II Comprehensive child find system	Yes	Yes	SPOE webSPOE	Parent Provider LEA		Yes		DHSS, DMH, Early Head Start, PAT	RICC
CF Family centered services		Yes	webSPOE	Parent Provider	Yes				

Indicator/Probe	Complaint System	Informal Issues System	Data Systems	Surveys	Quality Indicators	SPOE/SC Monitoring	Provider Monitoring/ Oversight	Interagency Work	Other
CE.I Access to service coordinator	Yes	Yes	webSPOE	Parent		Yes		DMH Service Coordinators	
CE.II Timely eval/assess – 45 day timelines	Yes	Yes	SPOE webSPOE	Parent Provider		Yes	Yes		
CE.III IFSPs include all services necessary and all identified services are provided	Yes	Yes	webSPOE	Parent	Yes	Yes	Yes		
CE.IV Services in NE and non-NE justification	Yes		webSPOE		Yes	Yes	Yes		
CE.V Improved and sustained functional abilities			webSPOE	Parent	Yes				School Entry Profile
CBT Early childhood transition	Yes	Yes	webSPOE	Parent Provider LEA	Yes	Yes			

In order to maximize the integration of all of the above data throughout a comprehensive General Supervision System for Missouri Part C, DESE has enlisted the assistance of Dr. Alan Coulter with National Center for Special Education Accountability Monitoring (NCSEAM). Division of Special Education (DSE) staff met with Dr. Coulter on July 22-23, 2004, and August 11-13, 2004, to begin the development of a focused monitoring system for Part C. The outcome of this meeting was to form an internal DSE workgroup with staff from each of the DSE sections (Funds Management, Compliance, Effective Practices and Data Coordination) to outline the major components of the Part C General Supervision requirements, activities, and responsibilities incorporating the data sources from the child data system. This framework is being compiled into a General Supervision Manual which is available online in draft form at <http://dese.mo.gov/divspeced/FirstSteps/pdfs/GenSupManualDRAFT.pdf>. This manual provides a format for outlining detailed procedures for general supervision responsibilities in each chapter area as listed below.

Chapters of the General Supervision Manual include:

1. Monitoring
2. Public Awareness
3. Comprehensive System of Professional Development
4. Complaint System
5. Data Collection
6. Financial Management
7. Interagency Agreements

The General Supervision Manual will be finalized prior to DESE's June 6, 2005, final report to OSEP regarding identification and correction of all noncompliance.

A stakeholder meeting was held January 27, 2005, to review and seek input on Missouri's current and proposed system of general supervision and provide information on focused monitoring. Specific input was solicited on strategies for provider monitoring/oversight. It is anticipated that Missouri will continue to work with NCSEAM on focusing its monitoring efforts.

COMPLIANCE MONITORING ACTIVITIES

Current SPOE Monitoring Activities

The chart below outlines the dates that initial and follow-up on-site monitoring visits were conducted with every SPOE in the First Steps system. DSE will continue to follow-up on all non-compliance through corrective action plans (CAPs), and beginning in June 2005 follow-up monitoring will address not only SPOE responsibilities, but also compliance requirements for ongoing service coordinators and providers.

Corrective Action Plans

As shown in the chart, the first CAPs received from SPOEs were not approved because they did not provide DESE the adequate assurances that the SPOEs understood the compliance requirements and had put in place effective strategies to achieve and maintain compliance within one year. Therefore, the First Steps Regional Consultants were trained and deployed to provide technical assistance to all SPOEs to refine their CAPs in January and February 2005. These revised CAPs are now being received and reviewed.

Future Monitoring Plans

In February and March 2005, DESE, with the assistance of First Steps Regional Consultants, conducted initial on-site monitoring of the Phase I re-bid SPOE Regions 2 and 4. This monitoring addresses not only SPOE responsibilities, but also compliance expectations for all on-going service coordinators (SPOE and DMH). Where non-compliance was found, corrective actions are being required (see below for compliance indicators related to ongoing service coordination). CAPs are required for systemic non-compliance and data to verify compliance with specific issues are required by the Final Report Letters. In addition, all non-compliance identified in specific children's files is required to be corrected as directed by DESE. Technical assistance will be provided by Consultants and DESE staff as needed to help ensure correction of non-compliance within one year, and a follow-up review will be conducted (by desk review, if possible) within nine months of the date of the Final Report Letter.

In June and July 2005, DESE will conduct follow-up reviews of all Phase II SPOEs as well as Region 1. All areas of non-compliance from previous reviews will be monitored for each region. In conjunction with the SPOE reviews, all indicators related to ongoing service coordination and early intervention providers will be monitored. Additional detail on service coordination and service provider responsibilities is included in sections CE.I and GS.IV, respectively.

Compliance indicators related to ongoing service coordinators:

- Parental consent for exchange of personally identifiable information
- Prior written notice and consent
- Written notification of IFSP meetings
- IFSP content
- Transition planning
- Timely IFSP meetings

Compliance indicators related to service providers:

- Implements services in accordance with the IFSP
- Completes and submits evaluation reports in a timely manner
- Submits complete and timely monthly progress reports to the SPOE

All compliance indicators regarding federal compliance required by OSEP have been outlined and categorized according to who will be monitored for each, what data will be used, and how often a review of the item will take place (monthly or quarterly data review, cyclical review, random data system check etc).

Monitoring strategies will include:

- File reviews including children served by DMH and independent ongoing service coordinators. Files will be selected randomly with certain characteristics identified to target areas of non-compliance from the previous review. Files will be selected to verify data submitted on reasons for exceeding 45 day timelines. Files will also be selected to address specific service coordinators or providers identified through the formal complaint system, informal issues data base, data on high amounts of services, as well as preliminary phone or Consultant-conducted interviews of SPOE staff. These interviews will be conducted prior to the monitoring visit to help identify issues with providers or ongoing service coordinators (failure to submit evaluation reports on time, failure to conduct timely meetings, informal complaints received by the SPOE etc.)
- Interviews will be held with a sample of SPOE staff from each region. Interviews will also be scheduled with a sample of DMH and independent service coordinators and providers. These may be randomly selected, but if specific issues have been identified as potential problems, specific individuals will be identified for interview. Parents will also be interviewed or surveyed where issues are identified related to provision of services from specific providers or service coordinators.
- The new webSPOE data system will help ensure compliance in a number of areas by creating reminders for service coordinators and preventing them from moving forward in the system until specific actions such as notices or meeting notifications are provided.

To further ensure compliance, beginning when new contracts are in place statewide, all SPOES will be placed on a three year cycle for verification review. This review process will address compliance for all intake and ongoing service coordinators, SPOE administration, and service providers in the region and will:

- Verify compliance by reviewing a sampling of source documents not available in the child data system (e.g. notices and evaluation reports)
- If deemed necessary and useful, provide a comprehensive review of all compliance indicators through a self assessment process conducted by each SPOE and verification of compliance calls by DESE staff with assistance from First Steps Regional Consultants
- Specifically target any areas of concerns identified through the systematic data review process.

Off-schedule reviews to target specific issues will also be conducted as needed based on areas identified through the systematic data review process and/or spot checks of data that will be possible through the webSPOE child data system. These will be conducted by desk review, if practical, based on the areas being reviewed, and if not practical, an on-site review will be conducted.

Final report letters will be provided to SPOEs within six weeks of the review. A Corrective Action Plan will be required for all systemic non-compliance identified. In addition, all non-compliance identified in specific children's files will be corrected as directed by DESE. Technical assistance will be provided by Consultants and DESE staff as needed to help ensure correction of non-compliance within one year, and a follow-up review will be conducted (by desk review, if possible) within nine months of the date of the Final Report Letter to verify the implementation of the corrective action and correction of the non-compliance.

Ongoing service coordinators (DMH and independent) and providers will also receive reports if non-compliance is identified, requiring corrective actions.

Sanctions

Intensive technical assistance will be provided when any of the above entities has been unable to correct non-compliance within one year. Sanctions will be imposed, as needed, and include the following:

- Submit frequent progress reports to DESE
- Implement specific procedures as defined by DESE
- Removal from the First Steps Matrix such that services can not be provided through First Steps
- Issues with DMH will be addressed through administrative strategies between DESE and DMH central office if correction is not accomplished

- Persistent non-compliance from SPOEs will ultimately affect their opportunity to continue to receive a contract through First Steps. Contract renewal was denied in one SPOE area during 2003-04.
- Liquidated damages for failure to meet performance requirements can be assessed as outlined in the new Phase I contracts
- Recovery of funds when improper billing is identified

Future Compliance Monitoring within the Context of Missouri's General Supervision Procedures

Missouri DESE recognizes that general supervision responsibilities encompass more than compliance monitoring and the complaint system. Procedures have been developed and are continuing to be refined for using the comprehensive data system available in Missouri to assist with oversight of all areas of general supervision: Monitoring, Public Awareness, CSPD, Complaint System, Data Collection, Financial Management, and Interagency Agreements.

These separate pieces overlap in many ways, and these areas are being integrated by:

- Developing a manual of procedures for each area
- Developing a systematic data review process that covers areas of compliance and additional areas targeted in the APR that can appropriately be addressed by data review. Data reviews began January 2005. First Steps team members and Consultants participate to help ensure an integrated approach. The process also allows for review of issues that have come in through the Informal Issues process.
- Charting all APR indicators and displaying the strategies used to analyze and address each area to ensure all available means to identify and address each area are being employed.

Missouri is continuing to work with NCSEAM and identified stakeholders in refining the state's General Supervision system and moving forward with focused monitoring to systematically address performance outcomes.

Monitoring Data

Results from SPOE monitoring visits are discussed under the applicable cluster/probe.

Missouri Part C Monitoring and Corrective Action Plan (CAP) Dates as of 2/22/05**Original Phase I (contracts were re-bid in 2004)**

Region	Initial Review	Report Sent	Follow-Up 1	Follow-Up Report Sent	CAP Due	CAP Rec'd	Doc. Due	Doc. Rec'd	Follow-Up 2
Child Day Care Association St Charles (1)	10/11/2002	4/16/2003	5/25/2004	10/29/2004	11/29/2004	11/29/2004	12/14/2004	1/5/2005	03/05 (See note 7)
United Cerebral Palsy of Greater St. Louis St Louis (2)	10/10/2002	4/16/2003	11/11/2003	4/5/2004	5/5/2004	7/1/2004 (see note 6)	5/26/2004	NA	NA
Community Services of Northwest Missouri Atchison (4)	11/19/2002	4/16/2003	5/17/2004	10/29/2004	See notes 3,4,5	NA		NA	NA
Young Women's Christian Association St. Joseph (5)	11/11/2002	4/16/2003	1/19/2004	10/29/2004	See notes 3,4,5	NA		NA	NA
Sunshine Center Clay,Platte,Ray (6)	11/11/2002	4/16/2003	5/14/2004	10/29/2004	See notes 3,4,5	NA		NA	NA

Phase I Re-Bid SPOEs (contracts awarded July 2004)

Region	Letter Assigning CAP	CAP Due	CAP Received	SPOE Specific Documentation Due	SPOE Specific Documentation Received	On-site
Child Day Care Association Greater St. Louis (1)	8/13/2004	9/28/2004	10/24/2004	11/15/2004	11/12/2004	Summer '05
Special School District of St. Louis County St. Louis Co. (2)	8/13/2004	9/27/2004	9/27/2004	11/13/2004	12/15/2004	02/05 (see note 5)
The Daulton Group, Inc Northwest (4)	10/29/2004	12/13/2004	11/18/2004	1/28/2005	1/21/2005	02/05 (see note 5)

Notes: Phase 1 SPOEs re-bid effective July 1, 2004

Note 1: Region 1 – Area was expanded to include St. Louis City

Note 2: Region 2 – Geographical area was divided with St. Louis City going to Region 1 and St. Louis County awarded to a new contractor

Note 3: Regions 4, 5, 6 – Were combined and awarded to a new contractor

Note 4: Corrective action plans from previous SPOEs were sent to new SPOEs to correct

Note 5: Regions 2, 4 – Phase 1 re-bid SPOEs will have initial on-site monitoring in February/March 2005, to include verification of corrective actions from previous SPOEs

Note 6: Region 1 – St. Louis SPOE's CAP was not acceptable, however the responsibility was transferred to the new SPOEs for Regions 1 and 2

Note 7: Follow-up will include verification of corrective action from previous SPOE

Missouri Part C Monitoring and Corrective Action Plan (CAP) Dates as of 3/14/05**Phase II**

Region	Initial Review	Report Sent	CAP Due	CAP Rec'd	Consultant CAP Training	Revised CAP Rec'd	CAP Approved*	Doc Due	Doc Rec'd	Doc Approved*	Follow-up Due
SEMO											
Jefferson County (3)	11/13/03	10/13/04	11/15/04	11/23/04	1/31/05	2/7/05		11/30/04	2/18/05		06/05
Farmington (7)	11/13/03	9/30/04	11/1/04	11/4/04	1/31/05	2/7/05		11/15/04	2/18/05		06/05
Poplar Bluff (21)	11/13/03	9/30/04	11/1/04	11/4/04	1/31/05	2/7/05		11/15/04	2/18/05		06/05
Bootheel (23)	11/13/03	9/30/04	11/1/04	11/4/04	1/31/05	2/7/05		11/15/04	2/18/05		06/05
ChildCare Connection											
Columbia (11)	6/17/04	9/28/04	10/28/04	11/5/04	2/1/05	3/13/05		11/11/04	3/1/05		06/05
Jefferson City (16)	6/14/04	10/7/04	11/8/04	11/23/04	1/16/05	3/3/05		11/24/04	3/24/05		07/05
First Steps of Southwest Missouri											
Joplin (12)	5/11/04	10/22/04	11/23/04	11/23/04	3/1/05	3/7/05		12/8/04	12/9/04		07/05
South Kansas City (14)	5/11/04	10/22/04	11/23/04	11/23/04	3/1/05	3/7/05		12/8/04	12/9/04		07/05
Bolivar (15)	5/11/04	10/22/04	11/23/04	11/23/04	3/1/05	3/7/05		12/8/04	12/9/04		07/05
First Steps - A program of Child Care Resource and Referral											
Springfield (13)	5/13/04	10/22/04	11/23/04	11/18/04	2/7/05	3/7/05		12/8/04	12/27/04		07/05
South Central MO (18)	5/11/04	10/22/04	11/23/04	11/18/04	2/7/05	3/7/05		12/8/04	12/27/04		07/05
West Plains (22)	5/11/04	10/22/04	11/23/04	11/18/04	2/7/05	3/7/05		12/8/04	12/27/04		07/05
Evergreen Behavioral Services											
Kirksville (8)	5/21/04	10/21/04	11/22/04	11/19/04	2/3/05	3/3/05		12/7/04	12/7/04		07/05
Union (19)	11/6/03	10/21/04	11/22/04	11/19/04	2/3/05	3/3/05		12/7/04	12/7/04		07/05
North Central Mo (24)	5/19/04	10/21/04	11/22/04	11/19/04	2/3/05	3/3/05		12/7/04	12/7/04		07/05
Hannibal (25)	11/16/03	10/21/04	11/22/04	11/19/04	2/3/05	3/3/05		12/7/04	12/7/04		07/05
Montgomery City (26)	11/16/03	10/21/04	11/22/04	11/19/04	2/3/05	3/3/05		12/7/04	12/7/04		07/05
The Children's Place											
Kansas City (9)	5/5/04	10/8/04	11/8/04	2/16/05	2/24/05	2/16/05		11/22/04	2/16/05		07/05
Children's Therapy Center											
Sedalia (10)	4/27/04	10/13/04	11/13/04	11/11/04	2/14/05	3/9/05		11/29/04	11/29/04		07/05
First Steps for Families											
Camdenton/Rolla (17)	4/9/04	10/22/04	11/23/04	1/9/05	2/14/05	3/17/05		12/8/04	1/21/05		07/05
Bringing Families Together											
Cuba (20)	4/5/04	10/22/04	11/22/04	12/1/04	2/25/05	3/24/05		12/7/04	12/1/04		07/05

* DESE staff are currently reviewing and approving corrective action plans and documentation. Reviews are scheduled to be completed by April 1, 2005.

2. Targets (for reporting period July 1, 2003 through June 30, 2004):

- Any areas of noncompliance identified and corrected in a timely manner
- All Phase 1 SPOE follow-ups conducted in 2003-04
- All Phase 2 SPOEs will be monitored during 2003-04

3. Explanation of Progress or Slippage (for reporting period July 1, 2003 through June 30, 2004):

Information under the Baseline/Trend Data section describe the progress made in developing Missouri's compliance monitoring and general supervision systems. In summary, much progress has been made in defining Missouri's system of general supervision, including the integration of all data available, and identifying where additional data/systems are needed. Beginning in February and March of 2005, ongoing service coordinators are being monitored and service provider monitoring will begin within the next few months.

4. Projected Targets:

- All follow-ups conducted show correction of non-compliance
- Any areas of noncompliance are identified and corrected in a timely manner
- Complete system of general supervision developed by June 2005
- Continue monitoring activities using complete system of general supervision during 2005-06

5. & 6. Future Activities to Achieve Projected Targets/Results and Projected Timelines and Resources:

See also CE.I, CE.II, CBT

New Cluster/ Probe	Future Activities to Achieve Projected Targets (5)	Projected Targets/ Evidence of Change (4)	Projected Timelines (6)	Resources (6)
GS.I GS.II	Monitoring of SPOEs	Ongoing monitoring, correction of past deficiencies, enforcement actions implemented if needed	Ongoing	Comp, Consultants
GS.I GS.II CE.I CE.II CBT	Monitoring of ongoing service coordinators	Ongoing monitoring, correction of past deficiencies, enforcement actions implemented if needed	2/2005 Ongoing	Comp, Consultants
GS.I GS.II GS.IV	Monitoring of providers	Ongoing monitoring, correction of past deficiencies, enforcement actions implemented if needed	6/2005 Ongoing	Comp, Consultants
GS.I GS.II	Identify standards to be monitored	Standards identified	2004-05	Comp
GS.I GS.II	Develop written monitoring procedures	Procedures developed	2004-05	Comp
GS.I GS.II	Establish data review process	Systemic issues identified and corrected	Ongoing	DSE Staff, Consultants